

## REMARKS

The claims as amended on July 19, 2004 have been objected to by the Examiner under 35 U.S.C. § 132 allegedly because the matter has been introduced. Applicants respectfully disagree that new matter has been introduced into the specification. The amendment that the wet pulp had not been subjected to mechanical defibering was inserted to clearly distinguish over the prior art references which all require mechanical defibering, such as hammermilling. As set forth in applicants' specification at page 4, lines 22-26 and page 6, lines 19-26, applicants' pulp is taken directly from a pulp mill and introduced into the jet drier. Clearly that occurs because the pulp travels from a pulp supply station (the pulp mill) directly to the jet drier. Inherently as disclosed, no mechanical defibering such as hammermilling occurs between the pulp mill and the jet drier. Thus, it is believed that the original amendment is clearly supported by the specification.

Nevertheless, applicants have deleted the previous phrase in Claim 1 and inserted the phrase that the never-dried wet pulp is introduced *directly from a pulp mill* into the jet drier. As disclosed, no mechanical defibering or other drying of the pulp occurs between the pulp mill and the jet drier. Accordingly, the objection to the claims under 35 U.S.C. § 132 has been obviated.

New Claim 40 has been added. It is similar to Claim 1, but contains the phrase "directly from a pulp mill without mechanical defibering." For the reasons stated above, it is believed this claim is supported by the specification.

The rejection of the claims under 35 U.S.C. § 112 is respectfully traversed. That rejection has also been obviated by further amendment to the claim.

It is submitted that this new amendment raises no new issues because it clearly sets forth that applicants' never-dried wet pulp is introduced *directly from a pulp mill* to the jet drier and as such is not subjected to mechanical defibering. This limitation for all intents and purposes is the

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same as the previous limitation, is clearly supported by the disclosure, and thus does not raise new issues.

The rejection of Claims 1-28 under 35 U.S.C. § 103(a) as being unpatentable over Westland et al., Graef et al., Wu et al., and Naieni et al. in view of Marsh and Crowther et al. is respectfully traversed. The Examiner is respectfully requested to note that Claim 1, the only independent claim in the application, has been amended and is now directed to a process for producing crosslinked singulated pulp fibers comprising the steps of (a) introducing a *never-dried* wet pulp *directly from a pulp mill* and air into a jet drier, (b) treating the wet pulp with a crosslinker, (c) thereafter drying the pulp in the jet drier to form singulated pulp fibers, and removing the pulp from the jet drier and separating the dried pulp fibers from the air in said jet drier. Specifically, the process is directed to *never-dried* wet pulp that is introduced into the jet drier *directly from a pulp mill*, and as such has not been subjected to mechanical defibering.

The Examiner will note that the four primary references operate on pulp that has been once dried. The pulp is reconstituted and a crosslinker applied. Thereafter, the pulp is defiberized with a mechanical device and is introduced into a flash drier. Thus, all of the primary references require previously dried pulp and also require mechanical defibering to achieve the stated results of low knot content. Applicants achieve their results with a *never-dried* wet pulp *directly from a pulpmill*, and yet yields a crosslinked pulp having low knots, fines and accepts. The Examiner admits that there is no disclosure of using never dried pulp directly from the pulp mill. There is no suggestion in any of the primary or secondary references that applicants' results can be achieved without mechanical defibering on a never-dried pulp. Because the principal references do not disclose or suggest the invention now defined in applicants' Claim 1, the secondary references add nothing.

Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness based on the references of record. Applicants have clearly set forth the differences between their

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claimed invention and the disclosures of the prior art. The claims now clearly define a patentable invention under 35 U.S.C. § 103 over that prior art.

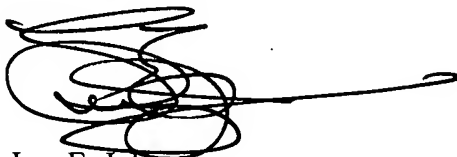
The rejection of Claim 39 under 35 U.S.C. § 102 is respectfully traversed. The rejection has been obviated by cancellation of Claim 39.

#### CONCLUSION

The Examiner is therefore respectfully requested to reexamine the application, to reconsider and withdraw the rejections of the claims under Section 112, Section 132, and Section 103(a), and to promptly allow the case and pass it to issue. If the Examiner has any further questions, he is invited to call applicants' attorney at the number listed below.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid and addressed to Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the below date.

Date:

December 29, 2004

John Munnag

LEJ:ejh/tmm